## Mertzel Law PLLC

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## **VIA ECF**

April 15, 2025

Honorable Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street, Courtroom 15A New York, NY 10007

Re: Sanders Collection Inc. v. dBest products Inc.; SDNY 24-cv-10045-AS

Dear Judge Subramanian:

I write on behalf of Defendant dbest Products, Inc. Defendant consents to Plaintiff's request for a two-week extension of time to respond to Defendant's motion to dismiss, to and including May 2, 2025 (ECF 19).<sup>1</sup> Defendant further requests a one-week extension of its time to reply, to and including May 16, 2025.

Defendant is filing this letter quickly and without contacting Plaintiff first so that the Court is aware of its consent and because Plaintiff indicated that its lead counsel is unavailable this week due to observance of the Passover holiday. This is Defendant's first request to extend the deadline for its reply papers.

Respectfully submitted,

Nancy J. Mertzel

cc: Counsel of Record

Nancy J. Muzil

Ehab M. Samuel (via email) (pro hac vice to be filed)

GRANTED. The parties have filed multiple submissions without consent of the other party, citing the other party's lack of responsiveness, only for the other party to quickly file a response. The parties should avoid burdening the Court's docket by waiting a reasonable amount of time to obtain consent from the other side before filing and by responding to emails in a timely manner. Further motions sought without following the Court's procedures will be summarily denied. The Clerk of Court is respectfully directed to terminate the motions at ECF Nos. 19 and 20.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: April 16, 2025

Defendant would have agreed to Plaintiff's request, but Plaintiff elected to seek unilateral relief before it had an opportunity to do so.